

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX Trading LTD., *et al.*¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 135 & 333

**CERTIFICATION OF COUNSEL REGARDING STIPULATION FOR
RESOLUTION OF MIAMI DADE COUNTY'S MOTION FOR STAY RELIEF
TO TERMINATE AND DEBTORS' MOTION TO REJECT**

I, Matthew R. Pierce, counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On November 11, 2022 and November 14, 2022, each of the above-captioned debtors and debtors in possession (the “Debtors”) commenced a case under chapter 11 of title of 11 of the United States Code (the “Bankruptcy Code”).
2. On November 22, 2022, Miami-Dade County, a political subdivision of the State of Florida (“Miami-Dade County”) filed its *Motion for Relief From the Automatic Stay to Terminate the Naming Rights Agreement* [D.I. 135] (the “Miami-Dade County Motion”).
3. By the Miami-Dade County Motion, Miami-Dade County seeks an order providing relief from the automatic stay, pursuant to section 362(d) of the Bankruptcy Code, in order to terminate the Naming Rights Agreement (the “Naming Rights Agreement”), dated as of March 31, 2021 by and between Debtor West Realm Shires Services, Inc., d/b/a FTX.US and Miami-Dade County.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtor’s claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

4. The Miami-Dade County Motion is scheduled to be heard on January 11, 2023.

5. On December 30, 2022, the Debtors filed the *Debtors' First Omnibus Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts Effective as of the Rejection Date* [D.I. 333] (the “Debtors' Motion”). The Debtors' Motion seeks to reject, among others, the Naming Rights Agreement effective as of December 30, 2022. The Debtors' Motion is currently scheduled to be heard on February 8, 2023.

6. The Debtors and Miami-Dade County have entered into a stipulation (the “Stipulation”) consensually resolving the Miami-Dade County Motion and the Debtors' Motion. Attached hereto as Exhibit A is a proposed order approving the Stipulation (the “Proposed Order”). Attached as Exhibit 1 to the Proposed Order is the Stipulation.

7. The Proposed Order has been circulated to counsel to Miami-Dade County, the Official Committee of Unsecured Creditors appointed in these Chapter 11 Cases (the “Committee”), and the Office of the United States Trustee (“UST”). The Committee and the UST have each advised it does not object to the entry of the Order.

8. Accordingly, the Debtors respectfully request entry of the Proposed Order attached hereto as Exhibit A at the Court’s earliest convenience.

Dated: January 11, 2023
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com

*Proposed Counsel for the Debtors
and Debtors-in-Possession*